



U. S. Steel
Clairton Works
400 State Street
Clairton, PA 15025-1855

March 9, 2000

Mr. James Hagedorn
Air Protection Division
Environmental Protection Agency
1650 Arch Street - 3AP12
Philadelphia, PA 19103-2029

Dear Mr. Hagedorn:

Subject: Semi-Annual Report as Required by 40 CFR, Part 61, §61.138 of Subpart L for the Reporting Period of July 1999 through December 1999

This report is being submitted to you to full the provisions of 40 CFR, Part 61, Subparts L and V for the Reporting Period of January 1999 through December 1999. This report also fulfills the requirements of by 40 CFR, Part 61, §61.138(f).

Equipment in Benzene Service

Monthly audits of equipment in benzene service as defined in 40 CFR, Part 61, Subparts L and V have been conducted in accordance with Environmental Protection Agency (EPA) Reference Method 21, "*Determination of Volatile Organic Compound Leaks.*" A Photovac MicroFID Organic Vapor Analyzer, or equivalent was used for monitoring. Gas standards of <1 parts per million (ppm) and 10,000 ppm of methane were used to zero and calibrate the instrument. Other standards of approximately 100 and 1000 ppm of methane were used to assure linearity of the instrument throughout the leak criteria range. Results of these monitoring events, including total components monitored and total leaking components identified, can be found in Table 1. Percent leakers are calculated on a quarterly basis, and are a ratio of total components leaking versus total components monitored. No leaks to any of the components were left unrepaired, and all leaks were fixed in the mandated 5/15-day period.

A revised component registry is attached to this report. This revised registry is to replace the registry submitted in March 1999. This revision includes new components and errors detected in the previous registry. A revised set of figures is also included. These figures have been updated to include the revisions in the registry.





Gas Blanketing Vessels

An audit of gas blanketing vessels was conducted on November 11th and 12th. A total of 48 vessels comprising of Loops B, C, D, E, G, and H of the Coke Oven Gas Blanketing System were screened and visually inspected for leaks and abnormalities. The loops' ductwork and components were also monitored and inspected. No abnormalities or leaks were discovered in the blanketing systems. Eleven cases of access hatches being left open were found in the semi-annual audit. All of these hatches were properly closed and sealed by Air/Compliance Consultants, Inc. (ACCI) personnel before screening the components for leaks.

A total of 5 vessels comprising of the Natural Gas Blanketing Loop for the Light Oil Storage Tank Area were screened and visually inspected for leaks and abnormalities. The loops' ductwork and components were also monitored and inspected. Two storage tanks (T-64 and T-65) were not monitored because the tanks were empty while undergoing maintenance and repair. These two tanks are now operational again, and will be incorporated in future monitoring events. No leaks were discovered in the blanketing system. No abnormalities in the blanketing systems were found during the monitoring event.

Difficult to Monitor Components

An annual audit of the components considered to be difficult to monitor was conducted on October 27th and 28th. A revised difficult to monitor registry has been included with this report, and is meant to replace the version that is currently on file. Several modifications to the previous plan have been incorporated, including a new component count. All DTM components are identified in the figures included with this report by either an asterisk or a star. Currently, 551 components are registered in the difficult to monitor plan. Of these, 134 are not monitored because they are under vacuum. Additionally, 274 components are considered too unsafe to monitor. These points will only be monitored when they are safe to monitor. Of the remaining 143 components, 141 were monitored. The other two components were out of service while undergoing repairs. No leaks were discovered during the difficult to monitor program.

Recordkeeping

A copy of this report is being maintained in the Benzene NESHAPs Program Manual on site. The benzene NESHAPs Program Manual is updated on a semi-annual basis, and includes a complete list of all regulatory requirements and process information pertinent





to this program. This report, and a copy of all monthly summary reports, will be maintained on site for a minimum of two years in a readily accessible location.

If you should have any questions or comments, please call me at (412) 233-1015.

Sincerely,

A handwritten signature in cursive script that reads "Coleen M. Davis".

Coleen M. Davis
Environmental Control Engineer

